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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION
13

14 UNITED STATES OF AMERICA,) NO. CR-21-00429 YGR
15 Plaintiff,) [FILED NOVEMBER 2, 2021]
16 v.)
17 RAY J. GARCIA,)
18 Defendant.)

19
20 UNITED STATES OF AMERICA,) NO. CR-22-00031 YGR
21 Plaintiff,) [FILED JANUARY 28, 2022]
22 v.) NOTICE OF RELATED CASE IN A CRIMINAL
23 ROSS KLINGER,) ACTION
24 Defendant.)

1 UNITED STATES OF AMERICA,

2 Plaintiff,

3 v.

4 JOHN RUSSELL BELLHOUSE,

5 Defendant.

) NO. CR-22-00066-YGR

) [FILED FEBRUARY 17, 2022]

) NOTICE OF RELATED CASE IN A CRIMINAL
) ACTION

7 UNITED STATES OF AMERICA,

8 Plaintiff,

9 v.

10 ENRIQUE CHAVEZ,

11 Defendant.

) NO. CR-22-00104-YGR

) [FILED MARCH 10, 2022]

) NOTICE OF RELATED CASE IN A CRIMINAL
) ACTION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 DARRELL WAYNE SMITH,

17 a/k/a "Dirty Dick Smith,"

18 Defendant.

) NO. CR-23-00110-YGR

) [FILED APRIL 13, 2023]

) NOTICE OF RELATED CASE IN A CRIMINAL
) ACTION

20 UNITED STATES OF AMERICA,

21 Plaintiff,

22 v.

23 ANDREW JONES,

24 Defendant.

) NO. CR-23-00212-YGR

) [FILED JULY 13, 2023]

) NOTICE OF RELATED CASE IN A CRIMINAL
) ACTION

1	UNITED STATES OF AMERICA,)	NO. CR-23-00213-YGR
2	Plaintiff,)	[FILED JULY 13, 2023]
3	v.)	NOTICE OF RELATED CASE IN A CRIMINAL
4	NAKIE NUNLEY,)	ACTION
5	Defendant.)	

7	UNITED STATES OF AMERICA,)	NO. CR-25-00180-AMO
8	Plaintiff,)	[FILED JUNE 25, 2025]
9	v.)	NOTICE OF RELATED CASE IN A CRIMINAL
10	JEFFREY RAYMOND WILSON,)	ACTION
11	Defendant.)	

13	UNITED STATES OF AMERICA,)	NO. CR-25-00181-HSG
14	Plaintiff,)	[FILED JUNE 25, 2025]
15	v.)	NOTICE OF RELATED CASE IN A CRIMINAL
16	LAWRENCE GACAD,)	ACTION
17	Defendant.)	

Pursuant to Local Criminal Rule 8-1, the United States of America hereby notifies the Court that the nine above-captioned criminal cases are related. In CR-21-00429, Ray J. GARCIA was charged with three counts of sexual abuse of a ward in violation of 18 U.S.C. § 2243(b), four counts of abusive sexual contact in violation of 18 U.S.C. § 2244(a)(4), and one count of making a false statement to a government agency in violation of 18 U.S.C. § 1001(a)(2). The conduct occurred between December 2019 and July 2021 while GARCIA was the associate warden and then warden at BOP Federal Correctional Institute in Dublin (hereafter "FCI Dublin").

In CR-22-00031, Ross KLINGER was charged with three counts of sexual abuse of a ward in violation of 18 U.S.C. § 2243(b). The conduct occurred in 2020 while KLINGER was a correctional officer at FCI Dublin and GARCIA was the associate warden.

1 In CR-22-00066, John Russell BELLHOUSE was charged with two counts of sexual abuse of
2 ward in violation of 18 U.S.C. § 2243(b) and three counts of abusive sexual contact in violation of
3 18 U.S.C. § 2244(a)(4). The conduct occurred between December 2019 and December 2020 while
4 BELLHOUSE was KLINGER's supervisor on the Safety & Recycling crew at FCI Dublin and while
5 GARCIA was the associate warden and then warden.

6 In CR-22-00104, Enrique CHAVEZ was charged with two counts of abusive sexual contact in
7 violation of 18 U.S.C. § 2244(a)(4). The conduct occurred in October 2020 while CHAVEZ was a
8 correctional officer at FCI Dublin, and GARCIA was the associate warden.

9 In CR-23-0110, Darrell Wayne SMITH is charged with six counts of sexual abuse of a ward, in
10 violation of 18 U.S.C. § 2243(b); six counts of abusive sexual contact, in violation of 18 U.S.C. §
11 2244(a)(4); one count of aggravated sexual abuse, in violation of 18 U.S.C. § 2241(a); and one count of
12 deprivation of rights under color of law, in violation of 18 U.S.C. § 242. The conduct occurred between
13 August 2016 and May 2021 while SMITH was a correctional officer at FCI Dublin and GARCIA was
14 the associate warden and then warden.

15 In CR-23-00212, Andrew JONES was charged with six counts of sexual abuse of a ward in
16 violation of 18 U.S.C. § 2243(b) and one count of making a false statement to a government agency in
17 violation of 18 U.S.C. § 1001(a)(2). The conduct occurred between July 2020 and June 2021 while
18 JONES was a correctional officer at FCI Dublin, and GARCIA was the associate warden and then
19 warden.

20 In CR-23-0213, Nakie NUNLEY was charged with four counts of sexual abuse of a ward in
21 violation of 18 U.S.C. § 2243(b), five counts of abusive sexual contact in violation of 18 U.S.C. §
22 2244(a)(4), and one count of making a false statement to a government agency in violation of 18 U.S.C.
23 § 1001(a)(2). The conduct occurred between March 2020 and November 2021 while NUNLEY was a
24 correctional officer at FCI Dublin and GARCIA was the associate warden and then warden.

25 In CR-25-0180, Jeffrey WILSON is charged with five counts of sexual abuse of a ward in
26 violation of 18 U.S.C. § 2243(b) and one count of making a false statement to a government agency in
27 violation of 18 U.S.C. § 1001(a)(2). The conduct occurred between March and August 2022 while
28 WILSON was a correctional officer at FCI Dublin.

1 In CR-25-0181, Lawrence GACAD is charged with one count of abusive sexual contact in
2 violation of 18 U.S.C. § 2244(a)(4). This conduct occurred between March and June 2022 while
3 GACAD was a correctional officer at FCI Dublin.

4 Thus, all nine cases involve sexual abuse of a ward at FCI Dublin during the same timeframe.
5 Moreover, GARCIA supervised KLINGER, BELLHOUSE, CHAVEZ, SMITH, JONES, and NUNLEY
6 during the timeframe of the abuse charged in those cases. GARCIA also supervised WILSON and
7 GACAD prior to the charged timeframe in those cases and prior to GARCIA being placed on
8 administrative leave from FCI Dublin on July 22, 2021, for sexually abusing inmates at the prison.

9 The government anticipates that the evidence that the government produces in these cases will
10 overlap. All nine cases arose from an investigation into FCI Dublin during the same timeframe, and
11 many of the interviews conducted by the government, as well as other evidence, pertain to all nine cases.
12 Based upon these facts, the cases are related within the meaning of Local Criminal Rule 8-1(b)(2)
13 because these actions appear likely to entail substantial duplication of labor if heard by different judges
14 or might create conflicts and unnecessary expenses if conducted before different judges.

15 Pursuant to Local Criminal Rule 8-1(c)(4), government counsel states that assignment of these
16 cases to a single judge is likely to conserve judicial resources and promote an efficient determination of
17 each action.

18 DATED: June 26, 2025

Respectfully submitted,

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20 United States Attorney

21 /s/ Andrew Paulson
22 ANDREW PAULSON
23 ALETHEA SARGENT
24 Assistant United States Attorneys
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